

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

BARBARA JANE FRECK, GLORIA	)	
ROBINSON, JALEEZA OWENS, LYNN	)	
MUSERELLI, PAUL CAPELLO, JIM	)	
HELTON, and JOSHUA CLARK	)	
individually and on behalf of all others	)	
similarly situated,	)	Civil Action
	)	No. 4:20-cv-00043-BCW
Plaintiffs,	)	
	)	
v.	)	
	)	
CERNER CORPORATION, et al.,	)	
	)	
Defendants.	)	

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS,  
AND APPROVAL OF PLAN OF ALLOCATION**

Named Plaintiffs Barbara Jane Freck, Gloria Robinson, Jaleeza Owens, Lynn Muserelli, Paul Capello, Jim Helton, and Joshua Clark (collectively, "Plaintiffs"), participants in the Cerner Corporation Foundations Retirement Plan (the "Plan"), by and through their undersigned counsel, hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting final approval to the class action settlement in this action on the terms of the Class Action Settlement Agreement ("Settlement Agreement"), fully executed on February 17, 2021 and previously filed with the Court on February 18, 2021;
2. Certifying the Class as defined in the Settlement Agreement;
3. Appointing Named Plaintiffs as Class Representatives and Plaintiffs' Counsel as Class Counsel under FED. R. CIV. P. 23(g);
4. Finding that the manner in which the Settlement Class was notified of the Settlement was the best practicable under the circumstances and adequately informed the

Settlement Class members of the terms of the Settlement, how to lodge an objection and obtain additional information; and

5. For such other relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following documents filed contemporaneously herewith:

A. Suggestions in Support of Plaintiffs' Motion For Final Approval of Class Action Settlement, Certification of Settlement Class, and Approval of Plan of Allocation;

B. Declarations of Plaintiffs' Counsel, the Named Plaintiffs, and the Settlement/Notice Administrator.

Attached hereto is the proposed Final Order and Judgment.

DATED: June 18, 2021

Respectfully submitted,

**CAPOZZI ADLER, P.C.**

/s/ Mark K. Gyandoh

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(admitted *pro hac vice*)

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*Proposed Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 18th, 2021 a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh  
Mark K. Gyandoh